

14-108

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0016 (August 2011)	FOR FCC USE ONLY
<b>FCC 346</b>		
<b>APPLICATION FOR AUTHORITY TO CONSTRUCT OR MAKE CHANGES IN A LOW POWER TV, TV TRANSLATOR OR TV BOOSTER STATION</b>		FOR COMMISSION USE ONLY FILE NO. BDFCDTL - 20130603AUD
Read INSTRUCTIONS Before Filling Out Form		

**Section I - General Information**

1. Legal Name of the Applicant WLNY-TV INC.		
Mailing Address 270 SOUTH SERVICE ROAD SUITE 45		
City MELVILLE	State or Country (if foreign address) NY	ZIP Code 11747 - 2337
Telephone Number (include area code) 6316229412	E-Mail Address (if available) DFEINBLATT@DUCKPOND CORP.COM	
FCC Registration Number: 0003740438	Call Sign WLIG-LP	Facility ID Number 9378
2. Contact Representative (if other than Applicant) RONALD A. SIEGEL		
Firm or Company Name COHN AND MARKS LLP		
Mailing Address 1920 N STREET, NW SUITE 300		
City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20036 -
Telephone Number (include area code) 2024524827	E-Mail Address (if available) RON.SIEGEL@COHNMARKS.COM	
3. If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial Educational Licensee/Permittee <input checked="" type="radio"/> Other MINOR AMENDMENT <input type="radio"/> N/A (Fee Required)		
4. Facility Information		
a. <input type="radio"/> Low Power TV Station <input type="radio"/> TV Translator <input type="radio"/> TV Booster <input checked="" type="radio"/> Digital Low Power TV <input type="radio"/> Digital TV Translator		
b. Community of License: City: PLAINVIEW State: NY		
5. Application Purpose		
<input type="radio"/> New station <input type="radio"/> Major Modification of construction permit <input type="radio"/> Major Change in licensed facility <input type="radio"/> Minor Modification of construction permit <input type="radio"/> Minor Change in licensed facility <input checked="" type="radio"/> Amendment to pending application <input type="radio"/> Digital Flash Cut <input type="radio"/> Digital Companion Channel		
a. File number of original construction permit or pending application: BDFCDTL-20130603AUD		
If an amendment, submit as an Exhibit a listing by Section and Question Number the portions of the pending application that are being revised. [Exhibit 1]		

**NOTE:** In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

## Section II - Legal

<b>1. Certification.</b> Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.	<input checked="" type="radio"/> Yes <input type="radio"/> No								
<b>2. Parties to the Application.</b> List the applicant and all parties to the application. If other than natural persons, list officers, directors, stockholders with interests of 1% or more, general and limited partners and/or members.									
<b>a.</b> Name and address of the applicant and, if applicable, its officers, directors, stockholders with interests of 1% or greater, or partners (if other than individual also show name, address and citizenship of natural person authorized to vote the stock). List the applicant first, officers next, then directors and, thereafter remaining stockholders and partners.	<table border="1"> <tr> <td data-bbox="727 604 760 688"><b>b.</b></td> <td data-bbox="760 604 1513 688">Citizenship.</td> </tr> <tr> <td data-bbox="727 688 760 814"><b>c.</b></td> <td data-bbox="760 688 1513 814">Positional Interest: Officer, director, general partner, limited partner, LLC member, etc.</td> </tr> <tr> <td data-bbox="727 814 760 898"><b>d.</b></td> <td data-bbox="760 814 1513 898">Percentage of votes.</td> </tr> <tr> <td data-bbox="727 898 760 1003"><b>e.</b></td> <td data-bbox="760 898 1513 1003">Percentage of equity.</td> </tr> </table>	<b>b.</b>	Citizenship.	<b>c.</b>	Positional Interest: Officer, director, general partner, limited partner, LLC member, etc.	<b>d.</b>	Percentage of votes.	<b>e.</b>	Percentage of equity.
<b>b.</b>	Citizenship.								
<b>c.</b>	Positional Interest: Officer, director, general partner, limited partner, LLC member, etc.								
<b>d.</b>	Percentage of votes.								
<b>e.</b>	Percentage of equity.								
[Enter Parties Information]									
<b>3. Character Issues.</b> Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with:  a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or b. any pending broadcast application in which character issues have been raised.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 2]								
<b>4. Adverse Findings.</b> Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 3]								
<b>5. Alien Ownership and Control.</b> Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 4]								
<b>6. Program Service Certification.</b> (For Low Power Television Applicants Only) Applicant certifies that this station will offer a broadcast program service.	<input checked="" type="radio"/> Yes <input type="radio"/> No								
<b>7. Local Public Notice.</b> (For new station and major change Applicants Only) Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.	<input type="radio"/> Yes <input type="radio"/> No								
<b>8. Rebroadcast Certification.</b> (For Applicants proposing translator rebroadcasts that are not the licensee of the primary station) Applicant certifies that written authority has been obtained from the licensee of the station whose programs are to be retransmitted.	<input checked="" type="radio"/> Yes <input type="radio"/> No								
<b>9. Auction Authorization.</b> If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A								



An exhibit is required unless this question is inapplicable.		[Exhibit 5]
10. <b>Anti-Drug Abuse Act Certification.</b> Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.		<input checked="" type="radio"/> Yes <input type="radio"/> No
I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)		
Typed or Printed Name of Person Signing DAVID FEINBLATT		Typed or Printed Title of Person Signing PRESIDENT
Signature		Date 06/17/2014

<b>Section III - Engineering (Digital)</b>				
<b>TECHNICAL SPECIFICATIONS</b>				
Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.				
<b>TECH BOX</b>				
1.	Channel: 17			
2.	Translator Input Channel No. : 47			
3.	Primary station proposed to be rebroadcast:			
	Facility Identifier	Call Sign	City	State
	73206	WLNY-TV	RIVERHEAD	NY
4.	Antenna Location Coordinates: (NAD 27)			
	Latitude:			
	Degrees 40 Minutes 46 Seconds 44 <input checked="" type="radio"/> North <input type="radio"/> South			
	Longitude:			
	Degrees 73 Minutes 25 Seconds 29 <input checked="" type="radio"/> West <input type="radio"/> East			
5.	Antenna Structure Registration Number:			
	<input checked="" type="checkbox"/> Not Applicable [Exhibit 10] <input type="checkbox"/> Notification filed with FAA			
6.	Antenna Location Site Elevation Above Mean Sea Level:		36 meters	
7.	Overall Tower Height Above Ground Level:		16 meters	
8.	Height of Radiation Center Above Ground Level:		12 meters	
9.	Maximum Effective Radiated Power (ERP):		1 kW	
10.	Transmitter Output Power:		0.12 kW	
11.	a. Transmitting Antenna:			
	Before selecting Directional "Off-the-Shelf", refer to "Search for Antenna Information" under <a href="http://licensing.fcc.gov/prod/cdb/publicacc/prod/cdb_pa.htm">CDBS Public Access</a> (http://licensing.fcc.gov/prod/cdb/publicacc/prod/cdb_pa.htm). Make sure that the Standard Pattern is marked Yes and that the relative field values shown match your values. Enter the Manufacturer (Make) and Model exactly as displayed in the Antenna Search.			
	<input type="radio"/> Nondirectional <input type="radio"/> Directional Off-the Shelf <input checked="" type="radio"/> Directional composite			
	Manufacturer SCA Model SL-8			
	b. Electrical Beam Tilt: degrees <input checked="" type="checkbox"/> Not Applicable			

c. Mechanical Beam Tilt: degrees toward azimuth      degrees True <input checked="" type="checkbox"/> Not Applicable											
d. Directional Antenna Relative Field Values: <input type="checkbox"/> N/A (Nondirectional or Off-the-Shelf)											
Rotation (Degrees): 150 <input type="checkbox"/> No Rotation											
Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value
0	1	10	0.99	20	0.99	30	0.97	40	0.94	50	0.91
60	0.85	70	0.78	80	0.73	90	0.68	100	0.66	110	0.65
120	0.65	130	0.66	140	0.68	150	0.69	160	0.7	170	0.71
180	0.72	190	0.7	200	0.69	210	0.67	220	0.65	230	0.64
240	0.64	250	0.65	260	0.66	270	0.69	280	0.74	290	0.79
300	0.85	310	0.89	320	0.93	330	0.96	340	0.98	350	0.99
Additional Azimuths											
e. Does the proposed antenna propose elevation radiation patterns that vary with azimuth for reasons other than the use of mechanical beam tilt? <input type="radio"/> Yes <input checked="" type="radio"/> No <div style="text-align: right;">[Exhibit 11]</div>											
If Yes, attach an Exhibit (see instructions for details).											

#### Relative Field Polar Plot

<b>NOTE:</b> In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.	
12.	<b>Out-of-channel Emission Mask:</b> <input type="radio"/> Simple <input type="radio"/> Stringent <input checked="" type="radio"/> Full Service
<b>CERTIFICATION</b>	
13.	<b>Interference :</b> The proposed facility complies with all of the following applicable rule sections. 47.C.F.R Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b) and 73.1030. <input checked="" type="radio"/> Yes <input type="radio"/> No <div style="text-align: right;">See Explanation in [Exhibit 12]</div>
14.	<b>Environmental Protection Act.</b> The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine RF compliance, an <b>Exhibit is required.</b> <input checked="" type="radio"/> Yes <input type="radio"/> No <div style="text-align: right;">See Explanation in [Exhibit 13]</div> <p>By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.</p>
15.	<b>Channels 52-59.</b> If the proposed channel is within channels 52-59, the applicant certifies compliance with the following requirements, as applicable:
<input type="checkbox"/> The applicant is applying for a digital companion channel for which no suitable channel from channel 2-51 is available.	
<input type="checkbox"/> Pursuant to Section 74.786(d), the applicant has notified, within 30 days of filing this application, all commercial wireless licenses of the spectrum comprising the proposed TV channel and the first adjacent channels thereto, for which the proposed digital LPTV or TV translator antenna site lies inside the licensed geographic boundaries of the wireless licensees or within 75 miles and 50 miles, respectively, of the geographic boundaries of co-channel and adjacent-channel wireless licensees.	



16. **Channels 60-69.** If the proposed channel is within channels 60-69, the applicant certifies compliance with the following requirements, as applicable:

- ☐ Pursuant to Section 74.786(e), the applicant has notified, within 30 days of filing this application, all commercial wireless licenses of the spectrum comprising the proposed TV channel and the first adjacent channels thereto, for which the proposed digital LPTV or TV translator antenna site lies inside the licensed geographic boundaries of the wireless licensees or within 75 miles and 50 miles, respectively, of the geographic boundaries of co-channel and adjacent-channel wireless licensees.
- ☐ Pursuant to Section 74.786(e), the applicant proposing operation on channel 63, 64, 68 and 69 ("public safety channels") has secured a coordinated spectrum use agreements(s) with 700 MHz public safety regional planning committee(s) and state administrator(s) of the region(s) and state(s) within which the antenna site of the digital LPTV or TV translator station is proposed to locate, and those adjoining regions and states with boundaries within 75 miles of the proposed station location.
- ☐ Pursuant to Section 74.786(e), the applicant for a channel adjacent to channel 63, 64, 68 or 69 has notified, within 30 days of filing this application, the 700 MHz public safety regional planning committee(s) and state administrator(s) of the region and state containing the proposed digital LPTV or TV translator antenna site and regions and states whose geographic boundaries lie within 50 miles of the proposed LPTV or TV translator antenna site.

**PREPARERS CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.**

### SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name CLARENCE M. BEVERAGE		Relationship to Applicant (e.g., Consulting Engineer) BROADCAST ENGINEERING CONSULTANT	
Signature		Date 06/17/2014	
Mailing Address COMMUNICATIONS TECHNOLOGIES, INC. P.O. BOX 1130			
City MARLTON	State or Country (if foreign address) NJ	Zip Code 08053 -	
Telephone Number (include area code) 8569850077		E-Mail Address (if available) CBEVERAGE@COMMTECHRF.COM	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

### Exhibits

#### Exhibit 1

Description: REASON FOR AMENDMENT

SECTION III, QUESTION 13, IS AMENDED TO INCLUDE AN ADDITIONAL ATTACHMENT TO EXHIBIT 12 -- CLARIFICATION OF FURTHER STATEMENT IN SUPPORT OF A REQUEST FOR WAIVER OF SECTION 74.709 OF THE FCC RULES AND A GRANT OF THE APPLICATION.

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**Attachment 1**

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**Exhibit 10**

**Description:** SUPPORT STRUCTURE

THE EXISTING CH 17 ANTENNA IS LICENSED AND WILL NOT BE CHANGED. THE TIP OF THE ANTENNA IS 16 METERS AGL. TOWAIR ANALYSIS STATES THAT THE STRUCTURE PASSES THE 100:1 SLOPE TEST BY 14 METERS WITH RESPECT TO THE SUFFOLK-FARMINGDALE AIRPORT AND THAT THERE ARE NO FAA REQUIREMENTS.

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**Attachment 10**

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**Exhibit 12**

**Description:** INTERFERENCE

AN OET-69 MAINFRAME STUDY OUTPUT IS ATTACHED DEMONSTRATING THAT THE PROPOSED FACILITY WOULD NOT CAUSE IMPERMISSABLE INTERFERENCE TO ANY OTHER LPTV OR FULL SERVICE FACILITY. IT IS NOTED THAT NO CHANGE IN ERP IS PROPOSED SIMPLY A FLASHCUT TO DIGITAL AT THE LICENSED ANALOG ERP.

A CHECK OF THE MAY 29, 2013 CDBS WAS UNDERTAKEN AND NO CHANGES IN THE DATABASE HAVE OCCURRED WHICH WOULD AFFECT THE STUDY RESULTS.

CH 17 WAS ORIGINALLY PROPOSED FOR WLIG-LP UNDER BMPTTL - 19990917AAN. THE CURRENT CH 17 SITE/ERP WERE FIRST SPECIFIED IN BMPTTL - 20050510ACC AND LICENSED UNDER BLTTL - 20050802AAY. WLIG-LP HAS OPERATED CONTINUOUSLY ON CH 17 WITHOUT COMPLAINT BY ANY USER OF THE ADJACENT CH 16 LM SPECTRUM. BASED ON THESE FACTS WLIG-LP CH 17 OPERATION AT 1 KW ERP IS BELIEVED TO BE GRANDFATHERED WITH RESPECT TO CH 16 LANDMOBILE OPERATIONS.

BECAUSE THE PROPOSED FACILITY IS IDENTICAL TO THE LICENSED FACILITY IN TERMS OF FREQUENCY, ERP, ANTENNA SYSTEM AND SITE LOCATION THERE IS NO CHANGE IN THE LOCATION OF THE THEORETICAL INTERFERENCE CONTOUR TO FIRST ADJACENT CHANNEL 16 LM OPERATIONS. IN PRACTICE THE PROPOSED FLASHCUT TO DTV WITH A FULL SERVICE MASK FILTER WILL DRAMATICALLY DECREASE OUT OF BAND EMISSIONS IN THE ADJACENT CH 16 SPECTRUM AND WOULD BE CONSIDERED AN ACTUAL DECREASE IN INTERFERENCE.

BASED ON THE ABOVE THE APPLICANT REQUESTS A WAIVER OF SECTION 74.709 OF THE RULES IF DEEMED NECESSARY BY THE FCC STAFF. IT IS NOTED THAT THIS APPLICATION WAS PRE-COORDINATED WITH THE STAFF.

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**Attachment 12**

Description
<u>OET-69 MAINFRAME ANALYSIS</u>
<u>Further statement in support of waiver request and grant of application</u>
<u>Clarification of Further Statement in Support of Waiver Request and Grant of Application</u>

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**Exhibit 13**

**Description:** ENVIRONMENTAL

THE BUILDING AND ANTENNA MOUNTED ON THE BUILDING ARE EXISTING. NO CHANGE IN ANTENNA



SYSTEM IS PROPOSED.

THE PROPOSED FACILITY HAS BEEN ANALYZED IN ACCORDANCE WITH THE PROCEDURES SET FORTH IN OET BULLETIN NO.65 (EDITION 97-01) EVALUATING COMPLIANCE WITH FCC GUIDELINES FOR HUMAN EXPOSURE TO RADIO FREQUENCY ELECTROMAGNETIC FIELDS. THE FORMULA BELOW FROM SUPPLEMENT A TO BULLETIN NO. 65 HAS BEEN USED TO EVALUATE THE PROPOSED CHANNEL 17 FACILITY:

$$S = [33.4 \times (F) \times (F) \times \text{ERP IN WATTS}] / R \text{ SQUARED}$$

S = POWER DENSITY IN UW/CM2

F = RELATIVE FIELD FACTOR (0.2 IN THIS CASE)

ERP = POWER IN WATTS (1,000 IN THIS CASE)

R = DISTANCE IN METERS (10 M - 2 METERS ABOVE THE GROUND) )

FOR TV CHANNEL 17, 491 MHZ, THE UNCONTROLLED EXPOSURE LIMIT IS 327.3 UW/CM2. THE CALCULATED POWER DENSITY OF 13.36 UW/CM2 IS EQUAL TO 4.1% OF THE ALLOWABLE POWER DENSITY FOR AN UNCONTROLLED ENVIRONMENT.

ON THIS BASIS, THE APPLICANT SUBMITS THAT THE PROPOSED CHANNEL 17 OPERATION WILL NOT HAVE A SIGNIFICANT ENVIRONMENTAL IMPACT WITH REGARD TO PUBLIC EXPOSURE. THE APPLICANT WILL REDUCE POWER OR CEASE TRANSMISSION AS REQUIRED TO MEET FCC WORKER EXPOSURE GUIDELINES.

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Attachment 13

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Percent allowed new interference: 0.500  
 Percent allowed new interference to non Class A LPTV: 2.000  
 Census data selected 2000  
 Data Base Selected  
 /home/Clarence.Beverage/DTV\_Data\_Files/pt\_tvdb.sff  
 TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 04-04-2013 Time: 10:30:04

Record Selected for Analysis

W17CR USERRECORD-01 PLAINVIEW NY US  
 Channel 17 ERP 1. kW HAAT 32. m RCAMSL 00048 m FULL SERVICE MASK  
 Latitude 040-46-44 Longitude 0073-25-29  
 Status APP Zone 1 Border Site number: 01  
 Last update Cutoff date Docket  
 Comments  
 Applicant

Cell Size for Service Analysis 1.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Not full service station  
 Service Class = LD  
 Maximum height/power limits not checked

Site number 1			
Azimuth	ERP	HAAT	51.0 dBu F(50,90)
(Deg)	(kW)	(m)	(km)
0.0	1.000	33.0	17.4
45.0	1.000	33.0	17.4
90.0	1.000	33.0	17.4
135.0	1.000	37.9	18.7
180.0	1.000	38.0	18.7
225.0	1.000	33.0	17.4
270.0	1.000	33.0	17.4
315.0	1.000	33.0	17.4

Database HAAT does not agree with computed HAAT  
 Database HAAT: 32 Computed HAAT: 34



Contour Overlap to Proposed Station

Station			
W17CD	17 STAMFORD	CT BLTTL20070201BSO	causes

Contour overlap to Digital LPTV station		
W17CR	17 PLAINVIEW	NY USERRECORD01

Station			
DW44BC	17 BRENTWOOD	NY BMPTTL19960517UQ	causes

Contour overlap to Digital LPTV station		
W17CR	17 PLAINVIEW	NY USERRECORD01

Station		
WLIG-LP	17 PLAINVIEW, ETC.	NY BLTTL20050802AAY

Station inside contour of Digital LPTV station		
W17CR	17 PLAINVIEW	NY USERRECORD01

Contour Overlap Evaluation to Proposed Station Complete

LANDMOBILE SPACING VIOLATIONS FOUND

Within protected contour of NEW YORK NY Channel 16

Checks to Site Number 01

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quiet zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

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# Start of Interference Analysis

Channel	Proposed Station Call	City/State	ARN
17	W17CR	PLAINVIEW NY	USERRECORD01

## Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
16	WTSD-CA	PHILADELPHIA PA	174.1	APP	BSTA	-20120910ACU
16	WTSD-CA	PHILADELPHIA PA	174.1	CP MOD	BMPDTA	-20120221ABQ
17	W17CD	STAMFORD CT	33.1	LIC	BLTTL	-20070201BSO
17	W17CI	CLAREMONT NH	306.2	LIC	BLTTA	-20020826ABL
17	WNMF-LD	MORRISTOWN NJ	91.5	LIC	BLDTL	-20080221ABE
17	WNMF-LD	MORRISTOWN NJ	91.5	CP	BPDTL	-20120120ABS
17	DW44BC	BRENTWOOD NY	33.7	APP	BMPTTL	-19960517UQ
17	WEBR-CD	MANHATTAN NY	47.4	LIC	BLDTA	-20090831ACL
17	WSYR-TV	SYRACUSE NY	322.9	LIC	BLCDT	-20030812ABK
17	WPHL-TV	PHILADELPHIA PA	174.1	LIC	BLCDT	-20090918ABV
17	DW59AI	STATE COLLEGE PA	373.4	CP	BDISDTT	-20080527ADG
17	WPXQ-TV	BLOCK ISLAND RI	158.7	LIC	BLCDT	-20050811AAT
18	WMBC-TV	NEWTON NJ	66.0	CP	BPCDT	-20080620ABX
18	WMBC-TV	NEWTON NJ	47.4	LIC	BLCDT	-20101130AAX +
18	WMBC-TV	NEWTON NJ	66.0	LIC	BLCDT	-20060803AMO
18	W18BN	SCRANTON PA	190.7	LIC	BLTTL	-19981228JB
20	W20CM	PORT JERVIS NY	123.5	LIC	BLTTL	-20071129AIS
24	W24EF	PORT JERVIS NY	123.5	LIC	BLTTL	-20121024AAA

+ Indicates station is part of a DTS

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## Analysis of Interference to Affected Station 1

### Analysis of current record

Channel	Call	City/State	Application	Ref. No.
16	WTSD-CA	PHILADELPHIA PA	BSTA	-20120910ACU

## Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
15	W36DO-D	DARBY PA	0.3	APP	BDISDTL	-20101203ABC
15	W36DO-D	DARBY PA	0.3	APP	BSTA	-20110128ABM
16	W22DA	FREDERICK MD	202.6	APP	BDISDTL	-20120124ADA
16	WRAV-LD	OCEAN CITY MD	174.0	CP	BDISDTL	-20090630ADF
16	WMJF-LP	TOWSON MD	137.3	LIC	BLTTA	-20050909ADB
16	W16CO-D	MIDDLEBURG PA	176.8	LIC	BLDTL	-20110222ADB
16	WHRO-TV	HAMPTON-NORFOLK VA	375.5	LIC	BLEDT	-20090701AFO
17	WPHL-TV	PHILADELPHIA PA	0.4	LIC	BLCDT	-20090918ABV
17	W17CR	PLAINVIEW NY	174.1	APP	USERRECORD-01	

Proposed station is beyond the site to  
nearest cell evaluation distance

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# Analysis of Interference to Affected Station 2

## Analysis of current record

Channel	Call	City/State	Application Ref. No.
16	WTSD-CA	PHILADELPHIA PA	BMPDTA -20120221ABQ

## Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
15	W36DO-D	DARBY PA	0.3	APP	BDISDTL -20101203ABC
15	W36DO-D	DARBY PA	0.3	APP	BSTA -20110128ABM
16	W22DA	FREDERICK MD	202.6	APP	BDISDTL -20120124ADA
16	WRAV-LD	OCEAN CITY MD	174.0	CP	BDISDTL -20090630ADF
16	WMJF-LP	TOWSON MD	137.3	LIC	BLTTA -20050909ADB
16	W16CO-D	MIDDLEBURG PA	176.8	LIC	BLDTL -20110222ADB
16	WHRO-TV	HAMPTON-NORFOLK VA	375.5	LIC	BLEDT -20090701AFO
17	WPHL-TV	PHILADELPHIA PA	0.4	LIC	BLCDT -20090918ABV
17	W17CR	PLAINVIEW NY	174.1	APP	USERRECORD-01

Proposal causes no interference

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# Analysis of Interference to Affected Station 3

## Analysis of current record

Channel	Call	City/State	Application Ref. No.
17	W17CD	STAMFORD CT	BLTTL -20070201BSO

## Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
17	WNMF-LD	MORRISTOWN NJ	87.7	LIC	BLDTL -20080221ABE
17	WNMF-LD	MORRISTOWN NJ	87.7	CP	BPDTL -20120120ABS
17	DW44BC	BRENTWOOD NY	48.7	APP	BMPTTL -19960517UQ
17	WEBR-CD	MANHATTAN NY	51.8	LIC	BLDTA -20090831ACL
17	WLIQ-LP	PLAINVIEW, ETC. NY	33.1	LIC	BLTTL -20050802AAY
17	WSYR-TV	SYRACUSE NY	293.2	LIC	BLCDT -20030812ABK
17	WPHL-TV	PHILADELPHIA PA	183.5	LIC	BLCDT -20090918ABV
17	WPXQ-TV	BLOCK ISLAND RI	153.7	LIC	BLCDT -20050811AAT
18	WMBC-TV	NEWTON NJ	60.2	CP	BPCDT -20080620ABX
18	WMBC-TV	NEWTON NJ	51.8	LIC	BLCDT -20101130AAX
18	WMBC-TV	NEWTON NJ	60.2	LIC	BLCDT -20060803AMO
18	WMBC-TV	NEWTON NJ	60.2	LIC	BLCDT -20101130AAX
20	WCCT-TV	WATERBURY CT	92.0	APP	BMPCDT -20080620AHG
20	WCCT-TV	WATERBURY CT	92.0	LIC	BLCDT -20090911ABK
21	WLIW	GARDEN CITY NY	31.5	LIC	BLEDT -20090612AEP
21	WLIW	GARDEN CITY NY	31.5	APP	BMPEDT -20080620AID
24	WNYE-TV	NEW YORK NY	51.2	LIC	BLEDT -20071228ABM
31	WTIC-TV	HARTFORD CT	92.0	LIC	BLCDT -20101222AAE
31	WPXN-TV	NEW YORK NY	51.8	LIC	BLCDT -20110729AAQ
31	WPXN-TV	NEW YORK NY	56.2	APP	BMPCDT -20080620ALZ
17	W17CR	PLAINVIEW NY	33.1	APP	USERRECORD-01

Proposal causes no interference

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# Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application Ref. No.
17	W17CI	CLAREMONT NH	BLTTA -20020826ABL

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
14	WPTZ	NORTH POLE NY	124.4	LIC	BLCDT -20070116ACW
17	WSYR-TV	SYRACUSE NY	294.6	LIC	BLCDT -20030812ABK
17	WPXQ-TV	BLOCK ISLAND RI	222.8	LIC	BLCDT -20050811AAT
18	WVTB	ST. JOHNSBURY VT	133.7	LIC	BLEDT -20080117ABR
24	WVTA	WINDSOR VT	0.0	LIC	BLEDT -20070307AAW
25	WNNE	HARTFORD VT	0.0	LIC	BLCDT -20050801BFZ
32	WETK	BURLINGTON VT	124.4	LIC	BLEDT -20061011ADW
32	WETK	BURLINGTON VT	124.4	APP	BPEDT -20050118AKO
17	W17CR	PLAINVIEW NY	306.2	APP	USERRECORD-01

Proposal causes no interference

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Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application Ref. No.
17	WNMF-LD	MORRISTOWN NJ	BLDTL -20080221ABE

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
17	W17CD	STAMFORD CT	87.7	LIC	BLTTL -20070201BSO
17	DW44BC	BRENTWOOD NY	124.5	APP	BMPTTL -19960517UQ
17	WEBR-CD	MANHATTAN NY	44.4	LIC	BLDTA -20090831ACL
17	WLIG-LP	PLAINVIEW, ETC. NY	91.5	LIC	BLTTL -20050802AAY
17	WSYR-TV	SYRACUSE NY	270.7	LIC	BLCDT -20030812ABK
17	WPHL-TV	PHILADELPHIA PA	103.1	LIC	BLCDT -20090918ABV
17	WPXQ-TV	BLOCK ISLAND RI	241.4	LIC	BLCDT -20050811AAT
18	WMBC-TV	NEWTON NJ	27.6	CP	BPCDT -20080620ABX
18	WMBC-TV	NEWTON NJ	44.4	LIC	BLCDT -20101130AAX
18	WMBC-TV	NEWTON NJ	27.6	LIC	BLCDT -20060803AMO
18	WMBC-TV	NEWTON NJ	27.6	LIC	BLCDT -20101130AAX
17	W17CR	PLAINVIEW NY	91.5	APP	USERRECORD-01

Proposal causes no interference

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Analysis of Interference to Affected Station 6

Analysis of current record

Channel	Call	City/State	Application Ref. No.
17	WNMF-LD	MORRISTOWN NJ	BPDTL -20120120ABS

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
17	W17CD	STAMFORD CT	87.7	LIC	BLTTL -20070201BSO
17	DW44BC	BRENTWOOD NY	124.5	APP	BMPTTL -19960517UQ
17	WEBR-CD	MANHATTAN NY	44.4	LIC	BLDTA -20090831ACL
17	WLIG-LP	PLAINVIEW, ETC. NY	91.5	LIC	BLTTL -20050802AAY
17	WSYR-TV	SYRACUSE NY	270.7	LIC	BLCDT -20030812ABK



17	WPHL-TV	PHILADELPHIA PA	103.1	LIC	BLCDDT	-20090918ABV
17	WPXQ-TV	BLOCK ISLAND RI	241.4	LIC	BLCDDT	-20050811AAT
18	WMBC-TV	NEWTON NJ	27.6	CP	BPCDDT	-20080620ABX
18	WMBC-TV	NEWTON NJ	44.4	LIC	BLCDDT	-20101130AAX
18	WMBC-TV	NEWTON NJ	27.6	LIC	BLCDDT	-20060803AMO
18	WMBC-TV	NEWTON NJ	27.6	LIC	BLCDDT	-20101130AAX
17	W17CR	PLAINVIEW NY	91.5	APP	USERRECORD-01	

Proposal causes no interference

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# Analysis of Interference to Affected Station 7

## Analysis of current record

Channel	Call	City/State	Application Ref. No.
17	DW44BC	BRENTWOOD NY	BMPTTL -19960517UQ

## Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
17	W17CD	STAMFORD CT	48.7	LIC	BLTTL -20070201BSO
17	WEBR-CD	MANHATTAN NY	80.9	LIC	BLDTA -20090831ACL
17	WLG-LP	PLAINVIEW, ETC. NY	33.7	LIC	BLTTL -20050802AAY
17	WSYR-TV	SYRACUSE NY	340.1	LIC	BLCDDT -20030812ABK
17	WPHL-TV	PHILADELPHIA PA	206.9	LIC	BLCDDT -20090918ABV
17	WPXQ-TV	BLOCK ISLAND RI	127.0	LIC	BLCDDT -20050811AAT
18	WMBC-TV	NEWTON NJ	98.2	CP	BPCDDT -20080620ABX
18	WMBC-TV	NEWTON NJ	80.9	LIC	BLCDDT -20101130AAX
18	WMBC-TV	NEWTON NJ	98.2	LIC	BLCDDT -20060803AMO
18	WMBC-TV	NEWTON NJ	98.2	LIC	BLCDDT -20101130AAX
20	WCCT-TV	WATERBURY CT	96.9	APP	BMPCDDT -20080620AHG
20	WCCT-TV	WATERBURY CT	96.9	LIC	BLCDDT -20090911ABK
21	WLIW	GARDEN CITY NY	35.8	LIC	BLEDT -20090612AEP
21	WLIW	GARDEN CITY NY	35.8	APP	BMPEDT -20080620AID
24	WNYE-TV	NEW YORK NY	80.8	LIC	BLEDT -20071228ABM
31	WTIC-TV	HARTFORD CT	96.9	LIC	BLCDDT -20101222AAE
31	WPXN-TV	NEW YORK NY	80.9	LIC	BLCDDT -20110729AAQ
31	WPXN-TV	NEW YORK NY	83.8	APP	BMPCDDT -20080620ALZ
17	W17CR	PLAINVIEW NY	33.7	APP	USERRECORD-01

Total scenarios = 2

Result key: 1  
 Scenario 1 Affected station 7  
 Before Analysis

Results for: 17N NY BRENTWOOD	BMPTTL	19960517UQ	APP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	1095508	2860.0	
not affected by terrain losses	1094146	2858.0	
lost to NTSC IX	265286	538.9	
lost to additional IX by ATV	16655	196.5	
lost to all IX	281941	735.3	

## Potential Interfering Stations Included in above Scenario 1

17N CT STAMFORD	BLTTL	20070201BSO	LIC
17A NY MANHATTAN	BLDTA	20090831ACL	LIC
17A PA PHILADELPHIA	BLCDDT	20090918ABV	LIC
17A RI BLOCK ISLAND	BLCDDT	20050811AAT	LIC

21A NY GARDEN CITY	BLEDT	20090612AEP	LIC
17N NY PLAINVIEW, ETC.	BLTTL	20050802AAY	LIC

After Analysis

Results for: 17N NY BRENTWOOD	BMPTTL	19960517UQ	APP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	1095508	2860.0	
not affected by terrain losses	1094146	2858.0	
lost to NTSC IX	22482	163.7	
lost to additional IX by ATV	160881	373.1	
lost to all IX	183363	536.9	

Potential Interfering Stations Included in above Scenario 1

17N CT STAMFORD	BLTTL	20070201BSO	LIC
17A NY MANHATTAN	BLDTA	20090831ACL	LIC
17A PA PHILADELPHIA	BLCDDT	20090918ABV	LIC
17A RI BLOCK ISLAND	BLCDDT	20050811AAT	LIC
21A NY GARDEN CITY	BLEDT	20090612AEP	LIC
17A NY PLAINVIEW	USERRECORD01		APP

Percent new IX = -8.9984%

Result key: 2  
 Scenario 2 Affected station 7  
 Before Analysis

Results for: 17N NY BRENTWOOD	BMPTTL	19960517UQ	APP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	1095508	2860.0	
not affected by terrain losses	1094146	2858.0	
lost to NTSC IX	265286	538.9	
lost to additional IX by ATV	16655	196.5	
lost to all IX	281941	735.3	

Potential Interfering Stations Included in above Scenario 2

17N CT STAMFORD	BLTTL	20070201BSO	LIC
17A NY MANHATTAN	BLDTA	20090831ACL	LIC
17A PA PHILADELPHIA	BLCDDT	20090918ABV	LIC
17A RI BLOCK ISLAND	BLCDDT	20050811AAT	LIC
21A NY GARDEN CITY	BMPEDT	20080620AID	APP
17N NY PLAINVIEW, ETC.	BLTTL	20050802AAY	LIC

After Analysis

Results for: 17N NY BRENTWOOD	BMPTTL	19960517UQ	APP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	1095508	2860.0	
not affected by terrain losses	1094146	2858.0	
lost to NTSC IX	22482	163.7	
lost to additional IX by ATV	160881	373.1	
lost to all IX	183363	536.9	

Potential Interfering Stations Included in above Scenario 2

17N CT STAMFORD	BLTTL	20070201BSO	LIC
17A NY MANHATTAN	BLDTA	20090831ACL	LIC
17A PA PHILADELPHIA	BLCDDT	20090918ABV	LIC
17A RI BLOCK ISLAND	BLCDDT	20050811AAT	LIC
21A NY GARDEN CITY	BMPEDT	20080620AID	APP
17A NY PLAINVIEW	USERRECORD01		APP



Percent new IX = -8.9984%

Worst case new IX -8.9984% Scenario 1

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#### Analysis of Interference to Affected Station 8

##### Analysis of current record

Channel	Call	City/State	Application Ref. No.
17	WEHR-CD	MANHATTAN NY	BLDTA -20090831ACL

##### Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
17	W17CD	STAMFORD CT	51.8	LIC	BLTTTL -20070201BSO
17	WNMF-LD	MORRISTOWN NJ	44.4	LIC	BLDTL -20080221ABE
17	WNMF-LD	MORRISTOWN NJ	44.4	CP	BPDTL -20120120ABS
17	DW44BC	BRENTWOOD NY	80.9	APP	BMPTTL -19960517UQ
17	WLIG-LP	PLAINVIEW, ETC. NY	47.4	LIC	BLTTTL -20050802AAY
17	WSYR-TV	SYRACUSE NY	296.8	LIC	BLCDT -20030812ABK
17	WPHL-TV	PHILADELPHIA PA	132.0	LIC	BLCDT -20090918ABV
17	WPXQ-TV	BLOCK ISLAND RI	202.1	LIC	BLCDT -20050811AAT
18	WMBC-TV	NEWTON NJ	22.2	CP	BPCDT -20080620ABX
18	WMBC-TV	NEWTON NJ	0.0	LIC	BLCDT -20101130AAX
18	WMBC-TV	NEWTON NJ	22.2	LIC	BLCDT -20060803AMO
18	WMBC-TV	NEWTON NJ	22.2	LIC	BLCDT -20101130AAX
17	W17CR	PLAINVIEW NY	47.4	APP	USERRECORD-01

Proposal causes no interference

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#### Analysis of Interference to Affected Station 9

##### Analysis of current record

Channel	Call	City/State	Application Ref. No.
17	WSYR-TV	SYRACUSE NY	BLCDT -20030812ABK

##### Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
16	WXXI-TV	ROCHESTER NY	128.5	LIC	BLEDT -20030916ABS
16	WXXI-TV	ROCHESTER NY	128.5	CP	BPEDT -20111103AAH
17	WPHL-TV	PHILADELPHIA PA	329.2	LIC	BLCDT -20090918ABV
17	WPXQ-TV	BLOCK ISLAND RI	384.3	LIC	BLCDT -20050811AAT
18	WETM-TV	ELMIRA NY	116.2	LIC	BLCDT -20090622AFJ
17	W17CR	PLAINVIEW NY	322.9	APP	USERRECORD-01

Proposal causes no interference

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#### Analysis of Interference to Affected Station 10

##### Analysis of current record

Channel	Call	City/State	Application Ref. No.
17	WPHL-TV	PHILADELPHIA PA	BLCDT -20090918ABV

# Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
17	WSYR-TV	SYRACUSE NY	329.2	LIC	BLCDT	-20030812ABK
17	WPXQ-TV	BLOCK ISLAND RI	332.6	LIC	BLCDT	-20050811AAT
18	WMBC-TV	NEWTON NJ	126.8	CP	BPCDT	-20080620ABX
18	WMBC-TV	NEWTON NJ	132.0	LIC	BLCDT	-20101130AAX
18	WMBC-TV	NEWTON NJ	126.8	LIC	BLCDT	-20060803AMO
18	WMBC-TV	NEWTON NJ	126.8	LIC	BLCDT	-20101130AAX
17	W17CR	PLAINVIEW NY	174.1	APP	USERRECORD-01	

Proposal causes no interference

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## Analysis of Interference to Affected Station 11

### Analysis of current record

Channel	Call	City/State	Application	Ref. No.
17	DW59AI	STATE COLLEGE PA	BDISDTT	-20080527ADG

# Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
16	W16CO-D	MIDDLEBURG PA	65.1	LIC	BLDTL	-20110222ADB
17	WBXZ-LP	BUFFALO NY	236.2	CP	BDISDTL	-20110901ACS
17	WSYR-TV	SYRACUSE NY	274.1	LIC	BLCDT	-20030812ABK
17	WKYC	CLEVELAND OH	324.9	LIC	BLCDT	-20090619ADC
17	WJMB-CD	BUTLER PA	170.6	APP	BSTA	-20130128AAU
17	WJMB-CD	BUTLER PA	170.6	LIC	BLDTA	-20121108ALX
17	W17DU-D	DUBOIS PA	94.9	CP	BNPDTL	-20100609AGF
17	NEW	NEW CASTLE PA	206.6	APP	BSFDTL	-20060630DCJ
17	WPHL-TV	PHILADELPHIA PA	241.2	LIC	BLCDT	-20090918ABV
17	W17CR	PLAINVIEW NY	373.4	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

#####

## Analysis of Interference to Affected Station 12

### Analysis of current record

Channel	Call	City/State	Application	Ref. No.
17	WPXQ-TV	BLOCK ISLAND RI	BLCDT	-20050811AAT

# Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
17	WSYR-TV	SYRACUSE NY	384.3	LIC	BLCDT	-20030812ABK
17	WPHL-TV	PHILADELPHIA PA	332.6	LIC	BLCDT	-20090918ABV
18	WMFP	LAWRENCE MA	101.6	LIC	BLCDT	-20061219ACO
18	WMBC-TV	NEWTON NJ	213.9	CP	BPCDT	-20080620ABX
18	WMBC-TV	NEWTON NJ	202.1	LIC	BLCDT	-20101130AAX
18	WMBC-TV	NEWTON NJ	213.9	LIC	BLCDT	-20060803AMO
18	WMBC-TV	NEWTON NJ	213.9	LIC	BLCDT	-20101130AAX
17	W17CR	PLAINVIEW NY	158.7	APP	USERRECORD-01	

Total scenarios = 1



Result key: 3  
 Scenario 1 Affected station 12  
 Before Analysis

Results for: 17A RI BLOCK ISLAND BLCDT 20050811AAT LIC  
 HAAT 228.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3162622	22695.0
not affected by terrain losses	3054514	22263.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	118970	316.4
lost to ATV IX only	118970	316.4
lost to all IX	118970	316.4

Potential Interfering Stations Included in above Scenario 1

17A PA PHILADELPHIA	BLCDT	20090918ABV	LIC
18A MA LAWRENCE	BLCDT	20061219ACO	LIC

After Analysis

Results for: 17A RI BLOCK ISLAND BLCDT 20050811AAT LIC  
 HAAT 228.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3162622	22695.0
not affected by terrain losses	3054514	22263.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	119044	317.4
lost to ATV IX only	119044	317.4
lost to all IX	119044	317.4

Potential Interfering Stations Included in above Scenario 1

17A PA PHILADELPHIA	BLCDT	20090918ABV	LIC
18A MA LAWRENCE	BLCDT	20061219ACO	LIC
17A NY PLAINVIEW	USERRECORD01		APP

Percent new IX = 0.0025%

Worst case new IX 0.0025% Scenario 1

#####

Analysis of Interference to Affected Station 13

Analysis of current record

Channel	Call	City/State	Application Ref. No.
18	WMBC-TV	NEWTON NJ	BPCDT -20080620ABX

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application Ref. No.
17	WPHL-TV	PHILADELPHIA PA	126.8	LIC	BLCDT -20090918ABV
17	WPXQ-TV	BLOCK ISLAND RI	213.9	LIC	BLCDT -20050811AAT
18	WMFP	LAWRENCE MA	294.9	LIC	BLCDT -20061219ACO
18	WETM-TV	ELMIRA NY	261.7	LIC	BLCDT -20090622AFJ
17	W17CR	PLAINVIEW NY	66.0	APP	USERRECORD-01

Total scenarios = 1

Result key: 4  
 Scenario 1 Affected station 13  
 Before Analysis

Results for: 18A NJ NEWTON BPCDT 20080620ABX CP

HAAT 250.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	19496954	26158.6
not affected by terrain losses	19193405	24763.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	103213	294.7
lost to ATV IX only	103213	294.7
lost to all IX	103213	294.7

Potential Interfering Stations Included in above Scenario 1

17A PA PHILADELPHIA	BLCDT	20090918ABV	LIC
18A MA LAWRENCE	BLCDT	20061219ACO	LIC
18A NY ELMIRA	BLCDT	20090622AFJ	LIC

After Analysis

Results for: 18A NJ NEWTON BPCDT 20080620ABX CP

HAAT 250.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	19496954	26158.6
not affected by terrain losses	19193405	24763.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	106399	303.7
lost to ATV IX only	106399	303.7
lost to all IX	106399	303.7

Potential Interfering Stations Included in above Scenario 1

17A PA PHILADELPHIA	BLCDT	20090918ABV	LIC
18A MA LAWRENCE	BLCDT	20061219ACO	LIC
18A NY ELMIRA	BLCDT	20090622AFJ	LIC
17A NY PLAINVIEW	USERRECORD01		APP

Percent new IX = 0.0167%

Worst case new IX 0.0167% Scenario 1

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Analysis of Interference to Affected Station 14

Analysis of current record

DTS STATION

Channel	Call	City/State	Application	Ref. No.
18	WMBC-TV	NEWTON NJ	BLCDT	-20101130AAX

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
17	WPHL-TV	PHILADELPHIA PA	126.8	LIC	BLCDT	-20090918ABV
17	WPXQ-TV	BLOCK ISLAND RI	213.9	LIC	BLCDT	-20050811AAT
18	WMFP	LAWRENCE MA	294.9	LIC	BLCDT	-20061219ACO
18	WETM-TV	ELMIRA NY	261.7	LIC	BLCDT	-20090622AFJ

17 W17CR PLAINVIEW NY 66.0 APP USERRECORD-01

Total scenarios = 1

Result key: 5  
Scenario 1 Affected station 14  
Before Analysis

Results for: 18A NJ NEWTON BLC DT 20101130AAX LIC  
HAAT 309.0 m, ATV ERP 90.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	18189030	23376.9
not affected by terrain losses	18009689	22541.7
lost to NTSC IX	0	0.0
lost to additional IX by ATV	13234	145.8
lost to ATV IX only	13234	145.8
lost to all IX	13234	145.8

Potential Interfering Stations Included in above Scenario 1

17A PA PHILADELPHIA	BLC DT	20090918ABV	LIC
18A MA LAWRENCE	BLC DT	20061219ACO	LIC
18A NY ELMIRA	BLC DT	20090622AFJ	LIC

After Analysis

Results for: 18A NJ NEWTON BLC DT 20101130AAX LIC  
HAAT 309.0 m, ATV ERP 90.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	18189030	23376.9
not affected by terrain losses	18009689	22541.7
lost to NTSC IX	0	0.0
lost to additional IX by ATV	17529	155.7
lost to ATV IX only	17529	155.7
lost to all IX	17529	155.7

Potential Interfering Stations Included in above Scenario 1

17A PA PHILADELPHIA	BLC DT	20090918ABV	LIC
18A MA LAWRENCE	BLC DT	20061219ACO	LIC
18A NY ELMIRA	BLC DT	20090622AFJ	LIC
17A NY PLAINVIEW	USERRECORD01		APP

Percent new IX = 0.0239%

Worst case new IX 0.0239% Scenario 1

#####

Analysis of Interference to Affected Station 15

Analysis of current record

Channel	Call	City/State	Application Ref. No.
18	WMBC-TV	NEWTON NJ	BLC DT -20060803AMO

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application Ref. No.
17	WPHL-TV	PHILADELPHIA PA	126.8	LIC	BLC DT -20090918ABV
17	WPXQ-TV	BLOCK ISLAND RI	213.9	LIC	BLC DT -20050811AAT



18	WMFP	LAWRENCE MA	294.9	LIC	BLCDDT	-20061219ACO
18	WETM-TV	ELMIRA NY	261.7	LIC	BLCDDT	-20090622AFJ
17	W17CR	PLAINVIEW NY	66.0	APP	USERRECORD-01	

Total scenarios = 1

Result key: 6  
 Scenario 1 Affected station 15  
 Before Analysis

Results for: 18A NJ NEWTON BLCDDT 20060803AMO LIC  
 HAAT 250.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	17461054	19603.9
not affected by terrain losses	17255675	18546.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	14724	151.8
lost to ATV IX only	14724	151.8
lost to all IX	14724	151.8

Potential Interfering Stations Included in above Scenario 1

17A PA PHILADELPHIA	BLCDDT	20090918ABV	LIC
18A MA LAWRENCE	BLCDDT	20061219ACO	LIC
18A NY ELMIRA	BLCDDT	20090622AFJ	LIC

After Analysis

Results for: 18A NJ NEWTON BLCDDT 20060803AMO LIC  
 HAAT 250.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	17461054	19603.9
not affected by terrain losses	17255675	18546.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	30959	177.6
lost to ATV IX only	30959	177.6
lost to all IX	30959	177.6

Potential Interfering Stations Included in above Scenario 1

17A PA PHILADELPHIA	BLCDDT	20090918ABV	LIC
18A MA LAWRENCE	BLCDDT	20061219ACO	LIC
18A NY ELMIRA	BLCDDT	20090622AFJ	LIC
17A NY PLAINVIEW	USERRECORD01		APP

Percent new IX = 0.0942%

Worst case new IX 0.0942% Scenario 1

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Analysis of Interference to Affected Station 16

Analysis of current record

Channel	Call	City/State	Application Ref. No.
18	W18BN	SCRANTON PA	BLTTL -19981228JB

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
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18	WMFP	LAWRENCE MA	356.7	LIC	BLCDDT	-20061219ACO
18	WMBC-TV	NEWTON NJ	130.9	CP	BPCDDT	-20080620ABX
18	WMBC-TV	NEWTON NJ	153.1	LIC	BLCDDT	-20101130AAX
18	WMBC-TV	NEWTON NJ	130.9	LIC	BLCDDT	-20060803AMO
18	WMBC-TV	NEWTON NJ	130.9	LIC	BLCDDT	-20101130AAX
18	WETM-TV	ELMIRA NY	132.1	LIC	BLCDDT	-20090622AFJ
20	WNYI	ITHACA NY	139.1	CP MOD	BMPCDDT	-20100430AEA
20	WNYI	ITHACA NY	139.1	LIC	BLCDDT	-20100520AEA
25	WTVE	READING PA	143.1	LIC	BLCDDT	-20100405ABM
25	WTVE	READING PA	142.0	APP	BPCDDT	-20100422ACQ
32	WQPX-TV	SCRANTON PA	30.2	LIC	BLCDDT	-20060629AFR
17	W17CR	PLAINVIEW NY	190.7	APP	USERRECORD-01	
25	WTVE	READING PA		LIC	BLCDDT	-20100405ABM

Proposed station is beyond the site to  
nearest cell evaluation distance

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#### Analysis of Interference to Affected Station 17

##### Analysis of current record

Channel	Call	City/State	Application Ref. No.
20	W20CM	PORT JERVIS NY	BLTTL -20071129AIS

##### Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
18	WMBC-TV	NEWTON NJ	68.4	CP	BPCDDT -20080620ABX
18	WMBC-TV	NEWTON NJ	89.7	LIC	BLCDDT -20101130AAX
18	WMBC-TV	NEWTON NJ	68.4	LIC	BLCDDT -20060803AMO
18	WMBC-TV	NEWTON NJ	68.4	LIC	BLCDDT -20101130AAX
19	W19DC-D	PORT JERVIS NY	31.9	CP MOD	BMPD TL -20080214ADY
20	WCCT-TV	WATERBURY CT	158.1	APP	BMPCDDT -20080620AHG
20	WCCT-TV	WATERBURY CT	158.1	LIC	BLCDDT -20090911ABK
20	WCVB-TV	BOSTON MA	303.7	LIC	BLCDDT -20020102AAH
20	WNYI	ITHACA NY	191.8	CP MOD	BMPCDDT -20100430AEA
20	WNYI	ITHACA NY	191.8	LIC	BLCDDT -20100520AEA
21	WLIW	GARDEN CITY NY	121.0	LIC	BLEDT -20090612AEP
21	WLIW	GARDEN CITY NY	121.0	APP	BMPEDT -20080620AID
24	WNYE-TV	NEW YORK NY	89.0	LIC	BLEDT -20071228ABM
27	WTBY-TV	POUGHKEEPSIE NY	62.4	LIC	BLCDDT -20090902ACZ
28	WNBC	NEW YORK NY	89.7	LIC	BLCDDT -20080409AAM
28	WNBC	NEW YORK NY	89.7	STA	BDSTA -20041220ADE
28	WNBC	NEW YORK NY	91.3	APP	BPCDDT -20080620ADL
34	WIVT	BINGHAMTON NY	130.5	LIC	BLCDDT -20090819AGR
17	W17CR	PLAINVIEW NY	123.5	APP	USERRECORD-01

Proposed station is beyond the site to  
nearest cell evaluation distance

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#### Analysis of Interference to Affected Station 18

##### Analysis of current record

Channel	Call	City/State	Application Ref. No.
24	W24EF	PORT JERVIS NY	BLTTL -20121024AAA

# Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref. No.
21	WLIW	GARDEN CITY NY	121.0	LIC	BLEDT	-20090612AEP
21	WLIW	GARDEN CITY NY	121.0	APP	BMPEDT	-20080620AID
24	WRGB	KINGSTON NY	85.6	LIC	BLCDT	-20110523AEL
24	WNYE-TV	NEW YORK NY	89.0	LIC	BLEDT	-20071228ABM
24	WSTM-TV	SYRACUSE NY	212.1	LIC	BLCDT	-20090622AEM
24	WATM-TV	ALTOONA PA	328.2	LIC	BLCDT	-20050603ACF
24	W24DB	CLARKS SUMMIT PA	88.0	LIC	BLTTA	-20041202ADB
24	W24BB	EAST STROUDSBURG PA	78.6	LIC	BLTTL	-19911219JM
24	WNVC	FAIRFAX VA	351.2	LIC	BLEDT	-20090612ACS
24	WVTA	WINDSOR VT	294.1	LIC	BLEDT	-20070307AAW
25	W25DY-D	MONTICELLO NY	33.0	LIC	BLDTT	-20100506AEI
27	WTBY-TV	POUGHKEEPSIE NY	62.4	LIC	BLCDT	-20090902ACZ
28	WNBC	NEW YORK NY	89.7	LIC	BLCDT	-20080409AAM
28	WNBC	NEW YORK NY	89.7	STA	BDSTA	-20041220ADE
28	WNBC	NEW YORK NY	91.3	APP	BPCDT	-20080620ADL
31	WPXN-TV	NEW YORK NY	89.7	LIC	BLCDT	-20110729AAQ
31	WPXN-TV	NEW YORK NY	91.3	APP	BMPCDT	-20080620ALZ
31	WSWB	SCRANTON PA	88.0	LIC	BMLCDT	-20090529AJJ
31	WSWB-DR	SCRANTON PA	88.0	APP	BPRM	-20080619ALI
32	WQPX-TV	SCRANTON PA	87.8	LIC	BLCDT	-20060629AFR
38	WWOR-TV	SECAUCUS NJ	89.7	CP	BPCDT	-20121210ABN
39	WCTX	NEW HAVEN CT	144.1	LIC	BLCDT	-20040507AAZ
39	WLVT-TV	ALLENTOWN PA	109.5	LIC	BLEDT	-20090605ABD
17	W17CR	PLAINVIEW NY	123.5	APP	USERRECORD-01	

Proposed station is beyond the site to  
nearest cell evaluation distance

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## Analysis of Interference to Affected Station 19

### Analysis of current record

Channel	Call	City/State	Application	Ref. No.
17	W17CR	PLAINVIEW NY	USERRECORD-01	

## Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref. No.
17	W17CD	STAMFORD CT	33.1	LIC	BLTTL	-20070201BSO
17	WNMF-LD	MORRISTOWN NJ	91.5	LIC	BLDTL	-20080221ABE
17	WNMF-LD	MORRISTOWN NJ	91.5	CP	BPDTL	-20120120ABS
17	DW44BC	BRENTWOOD NY	33.7	APP	BMPTTL	-19960517UQ
17	WEBR-CD	MANHATTAN NY	47.4	LIC	BLDTA	-20090831ACL
17	WSYR-TV	SYRACUSE NY	322.9	LIC	BLCDT	-20030812ABK
17	WPHL-TV	PHILADELPHIA PA	174.1	LIC	BLCDT	-20090918ABV
17	WPXQ-TV	BLOCK ISLAND RI	158.7	LIC	BLCDT	-20050811AAT
18	WMBC-TV	NEWTON NJ	66.0	CP	BPCDT	-20080620ABX
18	WMBC-TV	NEWTON NJ	47.4	LIC	BLCDT	-20101130AAX
18	WMBC-TV	NEWTON NJ	66.0	LIC	BLCDT	-20060803AMO
18	WMBC-TV	NEWTON NJ	66.0	LIC	BLCDT	-20101130AAX

Total scenarios = 9

Result key: 7  
Scenario 1 Affected station 19  
Before Analysis



Results for: 17A NY PLAINVIEW                      USERRECORD01                      APP  
 HAAT    32.0 m, ATV ERP    1.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1373954	1223.8
not affected by terrain losses	1373954	1223.8
lost to NTSC IX	36424	103.3
lost to additional IX by ATV	430377	333.8
lost to ATV IX only	461777	425.2
lost to all IX	466801	437.1

Potential Interfering Stations Included in above Scenario                      1

17N CT STAMFORD	BLTTL	20070201BSO	LIC
17A NJ MORRISTOWN	BPDTL	20120120ABS	CP
17A NY MANHATTAN	BLDTA	20090831ACL	LIC
17A PA PHILADELPHIA	BLCDD	20090918ABV	LIC
17A RI BLOCK ISLAND	BLCDD	20050811AAT	LIC
18A NJ NEWTON	BPCDD	20080620ABX	CP

Result key:                      8  
 Scenario                      2    Affected station                      19  
 Before Analysis

Results for: 17A NY PLAINVIEW                      USERRECORD01                      APP  
 HAAT    32.0 m, ATV ERP    1.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1373954	1223.8
not affected by terrain losses	1373954	1223.8
lost to NTSC IX	36424	103.3
lost to additional IX by ATV	430377	333.8
lost to ATV IX only	461166	423.2
lost to all IX	466801	437.1

Potential Interfering Stations Included in above Scenario                      2

17N CT STAMFORD	BLTTL	20070201BSO	LIC
17A NJ MORRISTOWN	BPDTL	20120120ABS	CP
17A NY MANHATTAN	BLDTA	20090831ACL	LIC
17A PA PHILADELPHIA	BLCDD	20090918ABV	LIC
17A RI BLOCK ISLAND	BLCDD	20050811AAT	LIC
18A NJ NEWTON	BLCDD	20060803AMO	LIC

Result key:                      9  
 Scenario                      3    Affected station                      19  
 Before Analysis

Results for: 17A NY PLAINVIEW                      USERRECORD01                      APP  
 HAAT    32.0 m, ATV ERP    1.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1373954	1223.8
not affected by terrain losses	1373954	1223.8
lost to NTSC IX	36424	103.3
lost to additional IX by ATV	430377	333.8
lost to ATV IX only	461166	423.2
lost to all IX	466801	437.1

Potential Interfering Stations Included in above Scenario

3

17N CT STAMFORD	BLTTL	20070201BSO	LIC
17A NJ MORRISTOWN	BPDTL	20120120ABS	CP
17A NY MANHATTAN	BLDTA	20090831ACL	LIC
17A PA PHILADELPHIA	BLCDDT	20090918ABV	LIC
17A RI BLOCK ISLAND	BLCDDT	20050811AAT	LIC
18A NJ NEWTON	BLCDDT	20101130AAX	LIC

Result key: 10  
 Scenario 4 Affected station 19  
 Before Analysis

Results for: 17A NY PLAINVIEW USERRECORD01 APP  
 HAAT 32.0 m, ATV ERP 1.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1373954	1223.8
not affected by terrain losses	1373954	1223.8
lost to NTSC IX	739615	682.4
lost to additional IX by ATV	1883	5.0
lost to ATV IX only	461777	425.2
lost to all IX	741498	687.4

Potential Interfering Stations Included in above Scenario

4

17N CT STAMFORD	BLTTL	20070201BSO	LIC
17N NY BRENTWOOD	BMPTTL	19960517UQ	APP
17A NJ MORRISTOWN	BPDTL	20120120ABS	CP
17A NY MANHATTAN	BLDTA	20090831ACL	LIC
17A PA PHILADELPHIA	BLCDDT	20090918ABV	LIC
17A RI BLOCK ISLAND	BLCDDT	20050811AAT	LIC
18A NJ NEWTON	BPCDDT	20080620ABX	CP

Result key: 11  
 Scenario 5 Affected station 19  
 Before Analysis

Results for: 17A NY PLAINVIEW USERRECORD01 APP  
 HAAT 32.0 m, ATV ERP 1.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1373954	1223.8
not affected by terrain losses	1373954	1223.8
lost to NTSC IX	739615	682.4
lost to additional IX by ATV	1883	5.0
lost to ATV IX only	461166	423.2
lost to all IX	741498	687.4

Potential Interfering Stations Included in above Scenario

5

17N CT STAMFORD	BLTTL	20070201BSO	LIC
17N NY BRENTWOOD	BMPTTL	19960517UQ	APP
17A NJ MORRISTOWN	BPDTL	20120120ABS	CP
17A NY MANHATTAN	BLDTA	20090831ACL	LIC
17A PA PHILADELPHIA	BLCDDT	20090918ABV	LIC
17A RI BLOCK ISLAND	BLCDDT	20050811AAT	LIC
18A NJ NEWTON	BLCDDT	20060803AMO	LIC

Result key: 12  
 Scenario 6 Affected station 19  
 Before Analysis

Results for: 17A NY PLAINVIEW                      USERRECORD01                      APP  
 HAAT 32.0 m, ATV ERP 1.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1373954	1223.8
not affected by terrain losses	1373954	1223.8
lost to NTSC IX	739615	682.4
lost to additional IX by ATV	1883	5.0
lost to ATV IX only	461166	423.2
lost to all IX	741498	687.4

Potential Interfering Stations Included in above Scenario 6

17N CT STAMFORD	BLTTL	20070201BSO	LIC
17N NY BRENTWOOD	BMP TTL	19960517UQ	APP
17A NJ MORRISTOWN	BPD TL	20120120ABS	CP
17A NY MANHATTAN	BLDTA	20090831ACL	LIC
17A PA PHILADELPHIA	BLCDT	20090918ABV	LIC
17A RI BLOCK ISLAND	BLCDT	20050811AAT	LIC
18A NJ NEWTON	BLCDT	20101130AAX	LIC

Result key: 13  
 Scenario 7 Affected station 19  
 Before Analysis

Results for: 17A NY PLAINVIEW                      USERRECORD01                      APP  
 HAAT 32.0 m, ATV ERP 1.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1373954	1223.8
not affected by terrain losses	1373954	1223.8
lost to NTSC IX	36424	103.3
lost to additional IX by ATV	430377	333.8
lost to ATV IX only	461777	425.2
lost to all IX	466801	437.1

Potential Interfering Stations Included in above Scenario 7

17N CT STAMFORD	BLTTL	20070201BSO	LIC
17A NJ MORRISTOWN	BPD TL	20120120ABS	CP
17A NY MANHATTAN	BLDTA	20090831ACL	LIC
17A PA PHILADELPHIA	BLCDT	20090918ABV	LIC
17A RI BLOCK ISLAND	BLCDT	20050811AAT	LIC
18A NJ NEWTON	BPCDT	20080620ABX	CP

Result key: 14  
 Scenario 8 Affected station 19  
 Before Analysis

Results for: 17A NY PLAINVIEW                      USERRECORD01                      APP  
 HAAT 32.0 m, ATV ERP 1.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1373954	1223.8
not affected by terrain losses	1373954	1223.8
lost to NTSC IX	36424	103.3
lost to additional IX by ATV	430377	333.8
lost to ATV IX only	461166	423.2
lost to all IX	466801	437.1



Potential Interfering Stations Included in above Scenario 8

17N CT STAMFORD	BLTTL	20070201BSO	LIC
17A NJ MORRISTOWN	BPDTL	20120120ABS	CP
17A NY MANHATTAN	BLDTA	20090831ACL	LIC
17A PA PHILADELPHIA	BLCDD	20090918ABV	LIC
17A RI BLOCK ISLAND	BLCDD	20050811AAT	LIC
18A NJ NEWTON	BLCDD	20060803AMO	LIC

Result key: 15  
 Scenario 9 Affected station 19  
 Before Analysis

Results for: 17A NY PLAINVIEW USERRECORD01 APP

HAAT 32.0 m, ATV ERP 1.0 kW	POPULATION	AREA (sq km)
within Noise Limited Contour	1373954	1223.8
not affected by terrain losses	1373954	1223.8
lost to NTSC IX	36424	103.3
lost to additional IX by ATV	430377	333.8
lost to ATV IX only	461166	423.2
lost to all IX	466801	437.1

Potential Interfering Stations Included in above Scenario 9

17N CT STAMFORD	BLTTL	20070201BSO	LIC
17A NJ MORRISTOWN	BPDTL	20120120ABS	CP
17A NY MANHATTAN	BLDTA	20090831ACL	LIC
17A PA PHILADELPHIA	BLCDD	20090918ABV	LIC
17A RI BLOCK ISLAND	BLCDD	20050811AAT	LIC
18A NJ NEWTON	BLCDD	20101130AAX	LIC

Proposal fails scenario	4	received IX increased to	30.3%
Proposal fails scenario	5	received IX increased to	30.3%
Proposal fails scenario	6	received IX increased to	30.3%
Proposal is MX with BMPTTL	19960517UQ	in scenario	4
Proposal is MX with BMPTTL	19960517UQ	in scenario	5
Proposal is MX with BMPTTL	19960517UQ	in scenario	6

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

### Further Statement in Support of Waiver Request and Grant of Application

This statement provides additional information in support of the application of WLNY-TV Inc. seeking approval for low power television station WLIG-LP, Plainview, NY, to flashcut from analog channel 17 to digital channel 17 (application file no. BDFCDTL20130603AUD). The application was accompanied by a request for waiver of section 74.709 of the FCC rules (land mobile station protection) insofar as that rule applies to the channel 16 land mobile service in New York, NY.

As explained more fully below, a grant of the WLIG-LP proposal would serve the public interest and be a win-win for both WLIG-LP and the channel 16 land mobile service in New York. As also shown below, the benefits derived from the grant can be achieved on a no-risk basis for all parties, including the FCC.

It is our understanding that there is no recognized standard or formula for determining actual interference between the broadcast operation of WLIG-LP and the channel 16 land mobile service. However, WLIG-LP has been operating on analog channel 17 since 2005 and during its nine years of operation, there have been no interference complaints by any users of the adjacent channel 16 spectrum or any other indication of interference. Most significantly, whether or not there is an interference issue based on the station's analog operation, a grant of the WLIG-LP digital channel 17 proposal will afford the channel 16 land mobile service significantly more interference protection than currently exist with WLIG-LP operating on analog channel 17.

As pointed out in exhibit 13 to the engineering portion of the application, the proposed WLIG-LP digital facility is identical its licensed analog facility in terms of frequency, ERP, antenna system and site location. In actuality, the flashcut to digital channel 17 with a full service mask filter, together with the existing multi-section filter now used by the station, will dramatically decrease out-of-band emissions to the adjacent channel 16 spectrum and will afford the channel 16 land mobile service significantly greater protection against interference than currently exists. While we believe that there is no actual interference based on the WLIG-LP current operation, if we assume for argument sake that there is such interference, it would be greatly reduced, if not eliminated, by virtue of the implementation of the WLIG-LP digital proposal.

The bottom line is that the WLIG-LP digital flashcut proposal would confer a real benefit on the channel 16 land mobile service in New York by increasing its interference protection over that which exists so long as WLIG-LP is operating in analog mode. This benefit can be achieved on a no-risk basis to all parties because if interference ever occurs, WLIG-LP, as a secondary service, will be required to eliminate the interference or cease operations. The FCC can condition the WLIG-LP construction permit to require the station to 1) eliminate interference or cease operation should interference ever occur and 2) install and operate with a full service mask filter and multi-section filter. It would make no sense at all from a public interest standpoint to disallow the WLIG-LP proposal which enables WLIG-LP to complete its transition to the digital world and greatly enhances the interference protection for the channel 16 land mobile service. There are no countervailing downsides associated with a grant of the application.



### Clarification of Further Statement in Support of Waiver Request and Grant of Application

This amendment is being filed in response to a request from the FCC staff for clarification of the first sentence of the last paragraph of the Further Statement in Support of Waiver Request and Grant of Application ("Further Statement") contained in the application. That sentence states "The bottom line is that the WLIG-LP digital flashcut proposal would confer a real benefit on the channel 16 land mobile service in New York by increasing its interference protection over that which exists so long as WLIG-LP is operating in analog mode." By way of clarification, the intent of the statement was to simply reflect the logical conclusion flowing from the factual showing set forth in the earlier portions of the Further Statement and further explained below.

The Further Statement demonstrates that the WLIG-LP proposed digital operation with a full service mask and multi-section filter will result in a dramatic decrease in out-of-band emissions, which is the energy transmitted by the LPTV station in the adjacent channel 16 land mobile spectrum.<sup>1</sup> The FCC rules recognize that the out-of-band emissions 3MHz from the LPTV channel band edge in the land mobile band are reduced 76 dB for digital LPTV operations compared to 60 dB for analog LPTV operations – a further reduction of 16 dB. See Sections 74.736(c)(3) [analog] and 74.794(a)(2)(ii) [digital]. Stated another way, if we consider the current analog radiated power of the LPTV station in the land mobile spectrum to be 100%, the proposed change to digital will reduce that radiated power to 2.5%. This decrease in emissions will provide the land mobile service significantly greater interference protection than that which exists based on WLIG-LP's current analog operation.

Implementation of WLIG-LP's digital proposal, which will enhance the interference protection for the channel 16 land mobile service, has no downside and is risk-free for all parties. WLIG-LP, as a secondary service, is subject to the FCC's continuing requirement to eliminate interference to primary services if it ever develops or ceases operations. Rejection of the WLIG-LP proposal would frustrate the underlying purpose of Section 74.709 of the rules, which is to prevent interference. On the other hand, a grant of the WLIG-LP waiver request and application clearly would satisfy the objective of Section 74.709 by increasing interference protection to the channel 16 land mobile service.

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<sup>1</sup> The WLIG-LP application proposes to flashcut from analog channel 17 to digital channel 17. The digital facility will be identical to the analog facility in terms of frequency, ERP, antenna system and site location.